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Via ECF and Email

March 10, 2025

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: United States v. Isaiah Douglas
7:23cr485 (KMK)

Dear Judge Karas:

The undersigned has been appointed as successor counsel to represent Isaiah Douglas in the above matter. I write the Court, *nunc pro tunc*, to request additional time to file motions on Mr. Douglas' behalf. The undersigned requests permission to file defendant's motions on or before Friday, April 11, 2025.

On December 16, 2024, the Court issued an order requiring that defense motions were to be filed by February 18, 2025. The undersigned has been working diligently in reviewing the discovery disclosed by the government, in identifying those non-frivolous issues that would give a legitimate basis for the filing of substantive motions, and at the same time, discussing the instant matter with both the government and the defendant with an eye towards resolving the matter short of trial. After these discussions, it appears that motions should be filed in this matter. As such, the undersigned moves, *nunc pro tunc*, for permission to file defense motions on or before Friday, April 11, 2025.

The undersigned has spoken with A.U.S.A. David A. Markewitz regarding the undersigned's request and the government does not object to this request.

Thank you for your consideration.

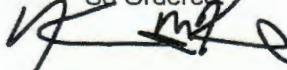
Respectfully submitted

/s/ *Bruce D. Koffsky*

Granted. All motions on behalf of Mr. Douglas should be filed by 4/11/25. Time is excluded until then, in the interests of justice, to allow counsel adequate time to prepare the Motions. See 18 U.S.C. Section 3161(h)(7)

(A). *The conf. Scheduled for 3/13/25 at 11:30 is adjourned.*

So Ordered



3/10/25